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May 17, 2024

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *White v. Samsung Electronics America, Inc., et al.*
Case No. 17-1775 (MCA) (JSA)

Dear Magistrate Judge Allen:

Defendant Samsung Electronics America, Inc. (“SEA”) respectfully requests an extension of time within which to file a motion to seal pursuant to Local Civil Rule 5.3(c)(2). Plaintiff does not oppose.

On May 3, 2024, Plaintiff filed an informal Letter application seeking to compel discovery. ECF No. 323. As Plaintiff’s Letter contained information designated as “Confidential” under the applicable Discovery Confidentiality Order, it was filed under seal. Under Local Civil Rule 5.3(c)(2), a motion to seal is due to be filed by May 24.

However, Plaintiff has filed several additional motions and informal discovery applications containing documents filed temporarily under seal, where all of the briefing on the various applications has not been completed. In accordance with Your Honor’s Text Order (ECF No. 331), briefing on some of these applications has been extended until June 10, 2024, thus, making motions to seal all confidential materials not yet ripe.

Should the Court grant this request for an extension of time to file ripe motions to seal, SEA shall file a single, Omnibus Motion to Seal by June 24, 2024, which, in compliance with Local Civil Rule 5.3(c)(2), would be 14 days following the June 10 completion of briefing.

If this extension is acceptable to the Court, SEA respectfully requests that the Court “So Order” this letter.

We thank the Court for its time and attention to this matter and are available at the Court’s convenience to address any questions or concerns.

GIBBONS P.C.

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SO ORDERED

/s/ Jessica S. Allen
Hon. Jessica S. Allen, U.S.M.J.

Date: 5/20/24

Respectfully submitted,

s/ Michael R. McDonald
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cc: All Counsel of Record (via ECF)